

TIFFANY & BOSCO
P.A.

2525 E. CAMELBACK ROAD
SUITE 300
PHOENIX, ARIZONA 85016
TELEPHONE: (602) 255-6000
FACSIMILE: (602) 255-0192

Mark S. Bosco
State Bar No. 010167
Leonard J. McDonald
State Bar No. 014228
Attorneys for Movant

12-09265

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF ARIZONA

IN RE:

Elias Y. Freij and Obdulia M. Freij,
Debtors.

Elias Y. Freij and Obdulia M. Freij,

Movant,
vs.

Bank of America, N.A., Successor by Merger to
BAC Home Loans Servicing, LP, FKA
Countrywide Home Loans Servicing, LP,

Respondents.

No. 4:12-bk-10829-EWH

Chapter 11

RESPONSE TO MOTION FOR
VALUATION HEARING

RE: Real Property Located at
2531 N. Jeanette Avenue
Tucson, AZ 85749

Bank of America, N.A., Successor by Merger to BAC Home Loans Servicing, LP, FKA
Countrywide Home Loans Servicing, LP ("Bank of America"), a secured creditor, by its attorneys,
TIFFANY & BOSCO, P.A., files this Response to Debtors' Motion For Valuation as follows:

1 Bank of America is the first deed of trust holder on the subject property commonly known as
2 2531 N. Jeanette Avenue, Tucson, AZ 85749 (hereinafter the "Property"), and is owed approximately
3 \$328,909.01 through October 15, 2012.

4 Bank of America, believes the Property is worth more than \$250,000 as alleged by Debtors.
5 Bank of America has obtained an appraisal of the Property that values the property at \$329,000.

6 WHEREFORE, Bank of America asks that this Court deny the requested Motion For Valuation.

7
8 DATED this 1st day of October, 2012.

9 Respectfully submitted,

10 TIFFANY & BOSCO, P.A.

11 BY /s/ LJM# 014228

12 Mark S. Bosco

13 Leonard J. McDonald

Attorney for Movant

14 COPY mailed this 1st day
15 of October, 2012 to:

16 Elias Y. Freij and Obdulia M. Freij
17 9121 E. Tanque Verde Rd., # 105
18 Tucson, AZ 85749
Debtors

19 Bank of America N.A.
20 P.O. Box 660933
Dallas, TX 75266-0933

21 U.S. Trustee
22 230 North First Avenue, Suite 204
23 Phoenix, AZ 85003
Trustee

24 Eric Slocum Sparks
25 110 South Church Avenue, Suite 2270
26 Tucson, AZ 85701
Attorney for Debtors

By: Amy Holly